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8
9 IN THE UNITED STATES DISTRICT COURT
10
11 EASTERN DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,
13 Plaintiff,

14 v.
15 2019 MERCEDES-BENZ E63 AMG-S, VIN:
WDDZF8KB8KA608709, CALIFORNIA
LICENSE NUMBER 1UEV351,
16 APPROXIMATELY 0.041836 BITCOIN,
17 APPROXIMATELY 18.12902639 BITCOIN,
18 APPROXIMATELY 26.56443065 BITCOIN,
19 APPROXIMATELY \$1,712,611.00 IN U.S.
CURRENCY,
20 ONE (1) BITCOIN CASASCIUS COIN,
21 ONE (1) CANADIAN GOLD COIN,
22 ONE (1) AMERICAN EAGLE GOLD COIN,
23 ONE (1) CUMMINS ALLISON MONEY
COUNTER,
24 APPROXIMATELY \$3,050.00 SEIZED
FROM LAMASSU BTM LOCATED AT 1301
MACARTHUR BOULEVARD, OAKLAND,
CALIFORNIA,
25 APPROXIMATELY \$51,590.00 SEIZED
FROM LAMASSU BTM LOCATED AT 395

2:20-MC-00072-TLN-EFB

26 STIPULATION AND ORDER EXTENDING TIME
27 FOR FILING A COMPLAINT FOR FORFEITURE
28 AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

1 BIRD AVENUE, SAN JOSE, CALIFORNIA,
2 APPROXIMATELY \$2,475.00 SEIZED
3 FROM LAMASSU BTM LOCATED AT 1310
4 BROADWAY, OAKLAND, CALIFORNIA,
5 APPROXIMATELY \$1,945.00 SEIZED
6 FROM LAMASSU BTM LOCATED AT 1305
7 N. BASCOM, SAN JOSE, CALIFORNIA,
8 APPROXIMATELY \$20,090.00 SEIZED
9 FROM LAMASSU BTM LOCATED AT 996
10 PINE STREET, SAN FRANCISCO,
11 CALIFORNIA,
12 APPROXIMATELY \$3,115.00 SEIZED
13 FROM LAMASSU BTM LOCATED AT
14 25757 SOTO ROAD, HAYWARD,
15 CALIFORNIA,
16 APPROXIMATELY \$24,890.00 SEIZED
17 FROM LAMASSU BTM LOCATED AT 1894
18 UNIVERSITY AVENUE, BERKELEY,
19 CALIFORNIA,
20 APPROXIMATELY \$3,800.00 SEIZED
21 FROM LAMASSU BTM LOCATED AT 7500
22 COMMERCIAL BOULEVARD, COTATI,
23 CALIFORNIA,
24 APPROXIMATELY \$3,325.00 SEIZED
25 FROM LAMASSU BTM LOCATED AT 14701 SAN PABLO AVENUE, SAN PABLO,
26 CALIFORNIA,
27 APPROXIMATELY \$3,785.00 SEIZED
28 FROM LAMASSU BTM LOCATED AT 3210
BUSKIRK AVENUE, PLEASANT HILL,
CALIFORNIA,
APPROXIMATELY \$2,835.00 SEIZED
FROM LAMASSU BTM LOCATED AT 605
CONTRA COSTA BOULEVARD,
CONCORD, CALIFORNIA,
APPROXIMATELY \$6,480.00 SEIZED
FROM LAMASSU BTM LOCATED AT 860
ARDEN WAY, SACRAMENTO,
CALIFORNIA,
APPROXIMATELY \$22,660.00 SEIZED
FROM LAMASSU BTM, LOCATED AT
1151 GALLERIA BOULEVARD,
ROSEVILLE, CALIFORNIA,

1 APPROXIMATELY \$14,805.00 SEIZED
2 FROM LAMASSU BTM LOCATED AT 5127
3 FRANKLIN BOULEVARD, SUITE 1,
4 SACRAMENTO, CALIFORNIA,

5 APPROXIMATELY \$10,340.00 SEIZED
6 FROM LAMASSU BTM LOCATED AT 620
7 W. CHARTER WAY, STOCKTON,
8 CALIFORNIA,

9 APPROXIMATELY \$6,010.00 SEIZED
10 FROM LAMASSU BTM LOCATED AT 4709
11 FLORIN ROAD, SACRAMENTO,
12 CALIFORNIA,

13 APPROXIMATELY \$6,125.00 SEIZED
14 FROM LAMASSU BTM LOCATED AT 2221
15 DEL PASO ROAD, SACRAMENTO,
16 CALIFORNIA,

17 APPROXIMATELY \$130.00 SEIZED FROM
18 LAMASSU BTM LOCATED AT 1744 N.
19 TEXAS STREET, FAIRFIELD,
20 CALIFORNIA, AND

21 APPROXIMATELY \$5,915.00 SEIZED
22 FROM LAMASSU BTM LOCATED AT 400
23 LINCOLN ROAD EAST, VALLEJO,
24 CALIFORNIA,

25 Defendants.

26 It is hereby stipulated by and between the United States of America and potential claimants
27 Rehan Alvi and Rubina Alvi (“claimants”), by and through their respective counsel as follows:

1. On or about November 26, 2019, the Homeland Security Investigations and Federal
2 Bureau of Investigation seized the above-referenced defendant assets pursuant to Federal seizure
3 warrants (hereafter collectively “defendant assets”).

4. Under 18 U.S.C. §§ 983(a)(1)(A)(i)-(iv), and 983(a)(3)(A), the United States is required
5 to send notice to potential claimants, file a complaint for forfeiture against the defendant assets, or
6 obtain an indictment alleging that the defendant assets are subject to forfeiture within ninety days of
7 seizure, unless the court extends the deadline for good cause shown or by agreement of the parties. That
8 deadline was April 17, 2020.

9. By Stipulation and Order filed April 1, 2020, the parties stipulated to extend to July 16,
10 2020, the time in which the United States is required to file a civil complaint for forfeiture against the

1 defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to
2 forfeiture.

3 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
4 October 14, 2020, the time in which the United States is required to file a civil complaint for forfeiture
5 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
6 to forfeiture.

7 5. Accordingly, the parties agree that the deadline by which the United States shall be
8 required to file a complaint for forfeiture against the defendant assets and/or to obtain an indictment
9 alleging that the defendant assets are subject to forfeiture shall be extended to October 14, 2020.

10 Dated: 6/24/2020

McGREGOR W. SCOTT
United States Attorney

12 By: /s/ Kevin C. Khasigian
13 KEVIN C. KHASIGIAN
14 Assistant U.S. Attorney

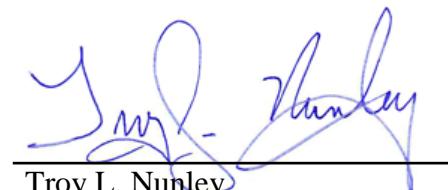
15 Dated: 6/24/2020

16 /s/ Thomas A. Johnson
17 THOMAS A. JOHNSON
18 Attorney for Potential Claimants
Rehan and Rubina Alvi

19 (Signatures authorized by email)

20 **IT IS SO ORDERED.**

21 Dated: June 24, 2020



22 Troy L. Nunley
23 United States District Judge